

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2011

Docket No. N2012-1

**UNITED STATES POSTAL SERVICE FIRST SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION TO
NATIONAL POSTAL MAIL HANDLERS UNION WITNESS WILKIN
(USPS/NPMHU-T5-1—7)
(May 23, 2012)**

Pursuant to Rules 25 through 28 of the Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production to National Postal Mail Handlers Union witness David Wilkin (NPMHU-T-5).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno
Chief Counsel
Global Business & Service Development

Caroline R. Brownlie

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3010; Fax -5402
May 23, 2012

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Instructions and Definitions

The term “describe” shall mean to detail in full, with specificity, the event or situation at issue.

The term “documents” has the meaning as ascribed within the Federal Rules of Civil Procedure and includes any documents or things that constitute or contain matters that are relevant to the subject matter of this proceeding and that are in the custody or control of the witness.

The term “relating” shall mean pertaining, describing, referring, evidencing, reflecting, discussing, showing, supporting, contradicting, refuting, constituting, embodying, containing, concerning, identifying, or in any way logically or factually connected with the matter discussed.

The words “or” and “and” shall be read in the conjunctive and not in the disjunctive wherever they appear, and neither of these words shall be interpreted to limit the scope of a request. The use of a verb in any tense shall be construed as the use of the verb in all other tenses and the singular form shall be deemed to include the plural, and vice-versa. The singular form of any noun shall be deemed to include the plural, and vice-versa.

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Interrogatories and Requests for Production

USPS/NPMHU-T5-1: On page 2, lines 20 through 22 of your testimony, you state that “[a]dditional mail would be added to Rochester from the Erie consolidation. This is an enormous increase in Rochester’s daily volume, and will likely result in further delays in the mail.”

- a. Please confirm whether this statement assumes operation in the current network with current service standards.
- b. If your statement does not assume the current network and current service standards, please identify the environment that you are describing in your statement?
- c. Please produce any documents or data that you relied upon in support of your statement.

USPS/NPMHU-T5-2: On page 2, lines 22 through 24 of your testimony, you state that “[t]he Rochester P&DC may be able to take on this mail, but, if there is any large influx of mail, the facility would be hard-pressed to get the mail out in a timely period.”

- a. Please confirm whether this statement assumes operation in the current network with current service standards.
- b. If your statement does not assume the current network and current service standards, please identify the environment that you are describing in your statement?
- c. Please state in terms of a percentage of current Rochester mail volume, the smallest increase that you would characterize as "large."
- d. Please define “timely period.”
- e. Please produce any documents or data that you relied upon in support of your analysis of Rochester P&DC's mail processing capacity, and identify and explain the specific portions that support your concern about the timely processing of a large influx of mail.

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USPS/NPMHU-T5-3: On page 3, lines 1 through 3 of your testimony, you state that you are “concerned that the Postal Service’s plan will leave the processing network with insufficient redundancy to handle unexpected increases in mail volume, or issues affecting one facility’s ability to process the mail.”

- a. Please state whether it is your understanding that when evaluating the ability of facilities to handle anticipated mail volume, the Postal Service assumes the planned volumes from the 95 percent peak day in 2010.
- b. If your answer to subpart (a) is anything other than an unqualified confirmation, please explain.
- c. If mail volumes continue to decline over the next decade, as projected by witness Masse (USPS-T-2), do you agree, all else equal, that this decline would decrease the need for redundant mail processing capacity in the future?
- d. If you do not agree with the statement in subpart (b), please explain.

USPS/NPMHU-T5-4: On page 3, lines 3 through 4 of your testimony, you state that “[i]n the past, the Postal Service would use the Buffalo facility to cover Rochester as needed, and vice versa.”

- a. Please confirm whether this statement assumes operation in the current network with current service standards.
- b. If your statement does not assume the current network with current service standards, please identify the environment that you are describing in your statement?
- c. Please describe the arrangements identified in the statement in greater detail, taking care to explain your understanding of their duration, the underlying (emergency or non-emergency) reasons for employing such arrangements, the mail operations involved in particular instances, the mail classes involved, the impacts on service performance, and years and seasons in which such arrangements have occurred since the year 2005.

USPS/NPMHU-T5-5: On page 3, lines 8 through 12, you state:

However, on even a very basic review, some of the cost estimates contained in the Buffalo AMP are plainly unsupportable. For instance, the AMP budgets only \$748,000 for employee relocation (page 43), yet the AMP also stated that 404 craft employees will need to be added in Rochester, as well as 24 management positions (pages 33, 34).

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Please state your understanding of whether the AMP study assumes that all identified employees will be relocated, rather than hired locally.

USPS/NPMHU-T5-6: On page 3, lines 18 through 20 of your testimony, you state that “[g]iven the poor economic climate in the Buffalo area, I believe many are likely to resist voluntary retirement. As a result, these savings are not likely to materialize fully.”

- a. Please state your understanding of the likelihood or possibility that the relevant employees may be given other assignments and that non-career employees can be released.
- b. Please furnish all documents that support your claim.

USPS/NPMHU-T5-7: On page 4, lines 3 through 5, you state that “[i]n my experience and based on my observations of the processing facilities in my Local, any idle time has already been eliminated through prior Postal efforts.” Please describe, in detail, your experience, education, or training related to assessment of the consolidation of postal facilities, including, but not limited to, your experience, education, or training to support your statement and produce any documents or data that you relied upon in support of your statement regarding "prior Postal efforts" that have reduced idle time at processing facilities in your Local.